

MAR 1 - 2019

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March 1, 2019

Mr. Thomas Sullivan, Chief
International Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554Re: *Information Request for IBFS File No. 325-NEW-20180614-00001*

Dear Mr. Sullivan:

This e-mail responds to the Information Request ("Request") dated February 15, 2019, sent by the International Bureau ("Bureau") to Wilkinson Barker Knauer, LLP ("WBK"), counsel to GLR Southern California, LLC and its parent company H&H Group USA LLC (collectively "Applicants"), in connection with IBFS File No. 325-NEW-20180614-00001.

While the Request is dated February 15, 2019 and noted as having been sent by Certified Mail -RRR, neither our firm nor any of the cc' parties received it until Monday, February 25, 2019. We take this Request very seriously and want to ensure that our response is accurate and complete, but given the detailed nature of the Request we are concerned that there is insufficient time to compile such a response. By this letter we hereby formally request a three week extension of the production deadline until **April 8, 2019**. We recognize that the Bureau does not routinely grant extensions of time.¹ However, we believe there is good cause to grant the extension in this case because: (1) the delayed receipt of the Request has already significantly reduced the time available to respond to the Bureau's inquiries; (2) production of the large volume of information described in the Request, much of which will require coordination among multiple stakeholders across multiple states, countries, and languages, will be complex and time-consuming; and (3) it will take time for Applicants to coordinate privilege and confidentiality requests among the multiple parties who possess information responsive to the Request. Grant of the extension will provide additional time necessary to ensure full compliance with the Request.

In addition to the request for extension, we would like to discuss ways to clarify (and possibly narrow) the scope of the Request so that the Applicants can ensure that they have

¹ 47 C.F.R. § 1.46.

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accurately produced all of requested materials without unnecessarily wasting the Applicants' or the Bureau's resources. In the event that the Bureau has additional questions about any of the materials that we provide, we can supplement the materials upon request.

First, the Applicants seek to clarify that scope of the Request with regards to any contracts or other documents between the Applicants, including those related to the transaction and any programming arrangements. Based on our understanding of the Request, we intend to provide the following:

- The fully executed purchase agreement along with the closing files for H&H's acquisition of GLR Southern California. Other than signed letters of intent between H&H and the owners of XEWW (which we can also provide), these documents are the sole set of documents or understandings governing the purchase of assets and equity related to the Station. These files contain over 25 documents (some of which are in Spanish). We will also confirm for staff that we have provided a complete set of documents and that there are no oral or other agreements with respect to the foregoing.
- Fully executed copies of all programming agreements for the Station between the applicants. This will include any current or prior arrangement for programming on the Station. We will also confirm for staff that we have provided a complete set of documents and that there are no oral or other agreements with respect to the foregoing.

Second, the Applicants request that the Bureau clarify the scope of Question 24(a) and Question 24(b). In order to play music on a Station, programmers obtain music licenses for a fee from third parties (such as ASCAP, BMI, SESAC) to air songs and other content they do not own. Additionally, broadcasters routinely sell advertising spots to third parties who pay them to run those spots. We are prepared to detail any consideration paid to air programming from H&H, GLR, Phoenix, and each of their respective affiliates or other third parties if that is what the Bureau is seeking. We can also provide a list of station advertisers and program suppliers.

For the Foregoing reasons, we request that the Bureau extend the deadline to file a response to the Request until **April 8, 2019**, and that it consider these proposals to modify the scope of the Request. The Applicants look forward to cooperating with the Bureau on this matter. Please contact us at your convenience to discuss the extension of time and the scope of the production.

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Sincerely,

/s/ Paige K. Fronabarger

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